

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN IMMIGRATION COUNCIL;
KATHRYN O. GREENBERG
IMMIGRATION JUSTICE CLINIC AT
THE BENJAMIN N. CARDOZO
SCHOOL OF LAW,

Plaintiffs,

v.

EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW;
U.S. DEPARTMENT OF JUSTICE,

Defendants.

Civil Action No. 1:19-cv-01835-DLC

**NOTICE OF PLAINTIFFS' CROSS-MOTION FOR SUMMARY JUDGMENT AND
OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE THAT, pursuant to Fed. R. Civ. P. 56, Plaintiffs American Immigration Council and Kathryn O. Greenberg Immigration Justice Clinic at the Benjamin Cardozo School of Law hereby move for summary judgment in this action brought under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, *et seq.*, on the basis that there is no genuine issue of disputed material fact and that Plaintiffs are entitled to judgment as a matter of law. The grounds for this motion are set forth in the accompanying memorandum.

In support of this cross-motion and in opposition to Defendants' motion for summary judgment, Plaintiffs submit the accompanying Memorandum in Opposition to Defendants' Motion for Summary Judgment and in Support of Plaintiffs' Cross-Motion for Summary

Judgment; Plaintiffs' Rule 56.1 Statement of Material Facts Not in Genuine Dispute; Declaration of Lindsay Nash; and Declaration of Kristin Macleod-Ball and exhibits.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's August 7, 2019, *see* Dkt. 38, Defendants must file their reply and opposition to Plaintiffs' cross-motion no later than September 5, 2019, and Plaintiffs must file their reply no later than September 18, 2019.

Respectfully Submitted,

s/ Claudia Valenzuela

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